

SUBJECT: Final Decision and Response to Comments for  
Univar, Inc., Omaha Nebraska

FROM: Don Bahnke  
FFSE Branch

THRU: Jody Hudson, Chief  
RCAP Branch

TO: William A. Spratlin, Director  
Air, RCRA, and Toxics Division

Attached for your approval is the Final Decision and Response to Comments (FD-RTC) for the Univar facility located at 4120 Buckingham Place in Omaha Nebraska. The selection of these corrective measures was based on information contained in the EPA-approved RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS) Report. The State has concurred on the selection of these corrective measures.

This facility is located in southeast Omaha. Adjacent areas contain industrial, commercial, and residential properties. A groundwater plume flows from the facility beneath both residential and commercial neighborhoods. Groundwater depth varies from about 70' below ground surface (bgs) at the facility to about 120' bgs at the nearest residences to discharge seeps at Spring Lake Park, approximately 3 miles east of the facility.

The RFI identified groundwater and soils as media of concern at the facility. Soils on-site are contaminated, in separate areas, with pesticides and chlorinated volatile organics constituents (CVOC). Groundwater is contaminated with CVOCs only. There are no current complete pathways for exposure to this contamination. Contaminated groundwater is 70' to 120' bgs and based on indoor air modeling, should not pose a threat to indoor air. No groundwater is currently being used and Omaha has prohibitions against developing groundwater for use in the future. The groundwater discharges through seeps in a hillside adjacent to a city park, but data indicate that the plume degrades to levels that are either non-detectable or below the MCLs before reaching the park. Since the facility began operations in the early 1950s, it appears that natural attenuation has been effective in preventing contaminant movement to the park. All soil contamination is on-site and access to the facility is limited by a gate and fence. In addition, prior to the facility investigation, Univar placed a Pemalon (plastic sheeting) cover over all exposed soil.

RCAP *JAM*  
MURROW  
12/ 21 /04

FFSE *cont*  
BAHNKE  
12/ *cont* /04  
*12/21/04 for Bahnke*

CNSL  
HOEFER  
12/ *cont* /04  
*DSK*

~~CNSL  
HUMPHREY  
12/ /04~~

RCAP  
HUDSON  
12/ 28 /04  
*J. Hudson*

ARTD  
SPRATLIN  
12/ /04

446459



RCRA RECORDS

The corrective measures are designed for plume containment and to prevent complete exposure pathways. For groundwater, a groundwater extraction/treatment system will be installed on-site in the source area to capture the contaminated groundwater located on-site and stop the spread of off-site contaminated groundwater. Monitored natural attenuation will be relied upon to address groundwater contamination that has migrated off-site that cannot be captured by the on-site extraction system. The effectiveness of this remedy will be monitored by a groundwater monitoring program implemented by Univar. For soils, an engineered cap will be installed to isolate contaminated soil and to reduce infiltration of precipitation that would wash contaminants into groundwater. This remedy, in addition to institutional controls for property transfer, access, construction, etc., should eliminate exposure to contaminated soil as well as ongoing soil to groundwater transfer of contamination.

To date, we have met several times with the South Omaha Neighborhood Association and the Spring Lake Park Association. Results of the RFI and CMS have been presented to these associations and they seem satisfied with this proposal. These corrective measures have been presented for public comment, and no adverse comments were received.

Upon approval of the FD-RTC, copies of it will be added to the Administrative Record. If you have any questions please contact me at ext. 7747.

Attachment

ARTD/FFSE/cas:h:/DBAHNKE/COVMEMO2.DOC/122004



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

SUBJECT: Final Decision and Response to Comments for  
Univar, Inc., Omaha Nebraska

FROM:

Don Bahnke  
FFSE Branch

*Pat Munroe for Don Bahnke*

THRU:

Jody Hudson, Chief  
RCAP Branch

*J. Hudson*

TO:

William A. Spratlin, Director  
Air, RCRA, and Toxics Division

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## FINAL DECISION AND RESPONSE TO COMMENTS

UNIVAR CORPORATION  
4120 BUCKINGHAM PLACE  
OMAHA, NEBRASKA  
EPA IDENTIFICATION # NED986375327

### INTRODUCTION

This Final Decision and Response to Comments (FD-RTC) is being presented by the U.S. Environmental Protection Agency (EPA). The purpose of this FD-RTC is to identify the selected corrective measures for implementation at the Univar Corporation facility located at 4120 Buckingham Place, Omaha, Nebraska (the "Facility", the general location of which is depicted on Figure 1), and address any issues raised during the public comment period on the Statement of Basis presented by EPA. (A Statement of Basis is an EPA document that provides a brief summary of all of the corrective measure alternatives considered for implementation at a given facility, and which highlights the key factors which led to the identification of the proposed corrective measure(s).) The public comment period on the Statement of Basis ran from May 12 through June 26, 2003.

As no comments on the corrective measures proposed in the Statement of Basis were received by EPA, EPA has selected the corrective measures as proposed in the Statement of Basis without any changes. The selected corrective measures are briefly described below.

### SELECTED CORRECTIVE MEASURES

The selected corrective measures for the Facility are:

- For contaminated soils – There are two components to this action: (1) the construction and maintenance of an engineered cover over areas of the Facility where soil is contaminated; and (2) the establishment of institutional controls.
- For contaminated groundwater located on-site - Extraction through pumping, treatment, and disposal by discharge into the local sanitary sewer system.
- For contaminated groundwater migrating off-site – Contaminated groundwater has migrated off-site. The groundwater extraction, treatment, and disposal measure described above will not be effective in capturing all of this off-site groundwater. A long-term groundwater monitoring program which will include downgradient monitoring wells will be established to verify that this off-site contaminated groundwater does not reach receptors at levels of concern. Monitoring data will be used to confirm the effectiveness of natural processes in attaining media cleanup standards. In addition to monitoring, a contingency plan will be prepared. This contingency plan will provide a mechanism to invoke containment or treatment measures, if future monitoring results indicate that natural processes are insufficient to achieve media cleanup standards.

The engineered covers will be designed and constructed to create a barrier between potential receptors at the ground surface and the underlying contaminated soil, eliminating the exposure pathway. The approximate lateral extent of the engineered covers are illustrated on Figure 2. Engineered covers will be constructed directly on top of the existing ground surface within each area. The existing concrete slabs will not be demolished. Instead, fill will be placed on the ground surface to establish acceptable drainage and asphalt pavement will be constructed above the fill. The asphalt pavement will consist of three inches of asphalt and approximately nine inches of base rock.

The engineered covers will greatly limit infiltration through the contaminated soil, reducing the potential for future mobilization of contamination into the groundwater. In addition, the location of the impacted soil and the need for EPA notification, appropriate health and safety measures, and proper soil management protocols during future earthwork events in this area will be recorded at the Douglas County Registrar of Deeds. This proprietary control is expected to take the form of a restrictive covenant or easement. As Nebraska has a marketable title statute that requires certain property interests to be re-filed every 23 years to remain valid (*R.R.S. Neb. § 76-290*), a protocol for ensuring that an effective institutional control remains in place for as long as necessary must be developed. A physical barrier and warning signs will be placed around the capped area and will be maintained to help ensure that subsurface work will not be conducted without the knowledge of the property owner.

The groundwater-monitoring system will involve the construction of monitoring wells screened in the I Sand Unit downgradient of the Facility. These wells will be located based on the conceptual model of the Facility and accessibility, with specific locations proposed in the Corrective Measures Implementation Workplan. Monitoring data will be collected at a specified frequency and used to confirm the effectiveness of natural processes in attaining media cleanup standards. The duration of monitoring will be based on periodic statistical evaluation of trends in the groundwater data, in accordance with the Corrective Measures Implementation Workplan.

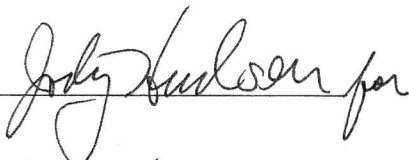
#### **PUBLIC PARTICIPATION ACTIVITIES**

EPA has met several times with the South Omaha Neighborhood Association and the Spring Lake Park Association. Results of the RCRA Facility Investigation and Corrective Measures Study have been presented to these associations and they seem satisfied with this proposal. The Statement of Basis for this Facility was made available for public comment from May 12, 2003 to June 26, 2003. No comments on the corrective measures proposed for the Facility were received.

#### **DECLARATIONS**

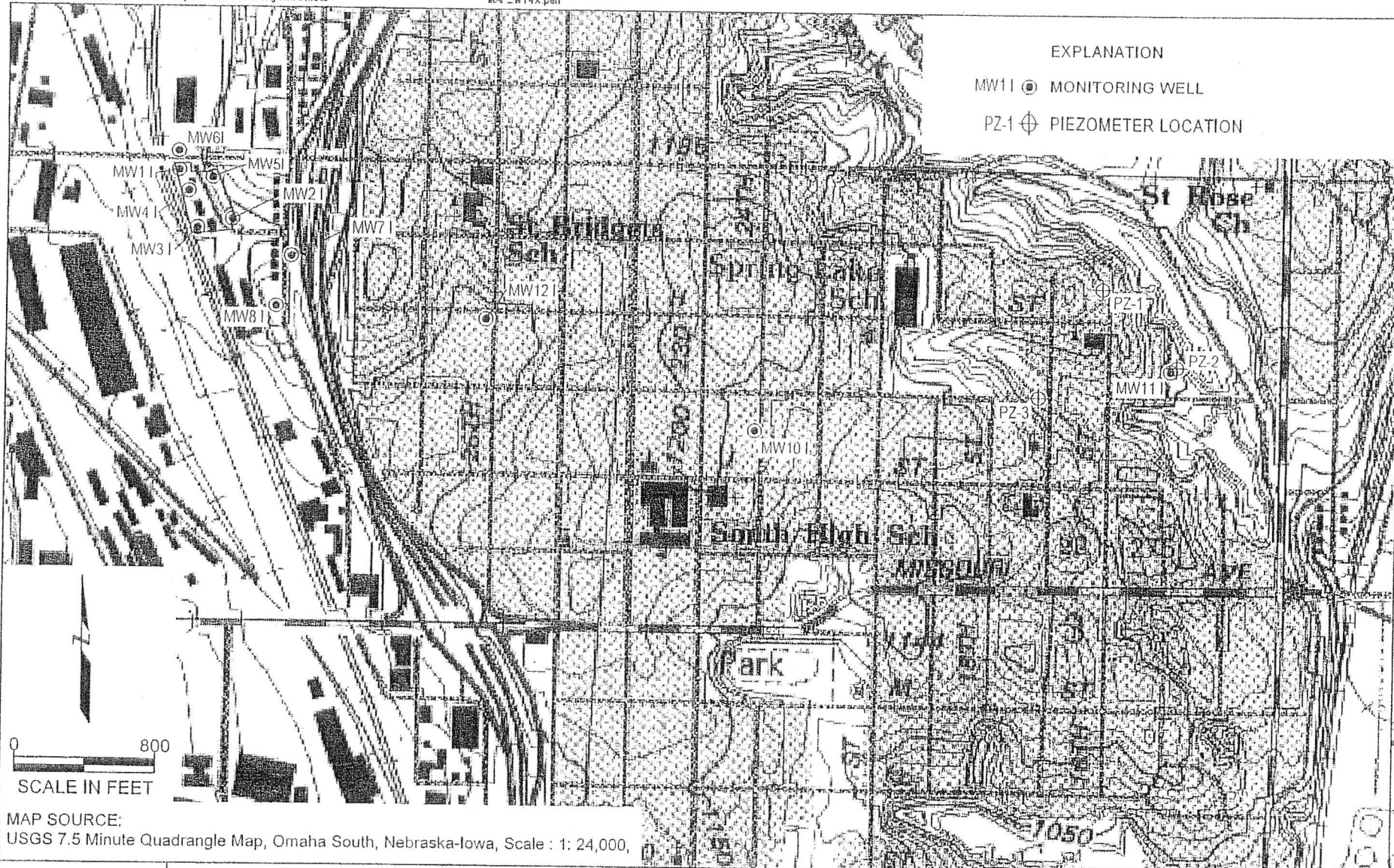
Based on the administrative record compiled for this Facility, I have determined that the selected corrective measures for the Facility are appropriate and will be protective of human health and the environment.

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12/28/04

Art Spratlin, Director  
Air, RCRA, and Toxics Division

Date



SITE MAP  
4120 Buckingham Place  
Omaha, Nebraska

Project No.  
4132 H

Figure  
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AREA FOR ENGINEERED CAP

4120 Buckingham Place  
 Omaha, Nebraska

Project No.  
 4132

Figure

